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**NO FEE – GOV'T CODE § 6103**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No.:

Plaintiff,

**COMPLAINT FOR ABATEMENT AND  
INJUNCTION**

vs.

MARY RUTH SANSOM, an individual; and DOES 1  
through 50, inclusive,

[HEALTH & SAF. CODE  
SECTION 11570, *ET SEQ.*; CIVIL  
CODE SECTION 3479, *ET SEQ.*]

Defendants.

(Unlimited Action)

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

**I. INTRODUCTION**

1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the State of California ("Plaintiff or "People"), for the purpose of abating a serious narcotics-related public nuisance that exists at a single family residence located at 1675 East 112th Street, in the Watts neighborhood in South Los Angeles ("Property"). The captioned defendant ("Defendant") owns and resides at the Property, which is approximately 250 feet from a local elementary school.

1           2.     The Property is a quintessential “drug house” that has been, and is currently, the  
2 primary retail rock cocaine source in the surrounding area. Since 2016, the Los Angeles  
3 Police Department (“LAPD”) has made six separate controlled rock cocaine purchases from  
4 multiple different individuals residing at or otherwise connected to the Property, and has  
5 executed three search warrants there. Of course, the total amount and scale of narcotics  
6 activity (and all other crime) at the Property is much greater than what the police have been  
7 able to document themselves, given limited resources, reticence by some to report crime, and  
8 the repetitive nature of narcotics sales routines.

9           3.     Beginning in 2016, a Los Angeles Police Department (“LAPD”)/Bureau of  
10 Alcohol, Tobacco, Firearms and Explosives (“ATF”) task force targeting narcotics, firearms,  
11 and violent crime offenders connected to the Bounty Hunter Bloods (“Bounty Hunters”) criminal  
12 street gang began focusing on a resident of the Property named Darryal Hill (“Hill”). Hill is a  
13 self-admitted Bounty Hunter gang member who came to the task force’s attention, in part,  
14 because he was a suspect in a shooting that occurred in front of the Property in March 2016  
15 (*see, infra*, ¶19).

16           4.     Between May 2016 and February 2017, an LAPD/ATF non-confidential informant  
17 (“NCI”) made four controlled purchases of rock cocaine from Hill at the Property. The NCI  
18 purchased counterfeit currency from Hill at the Property on a separate occasion, as well. One  
19 of the surveillance videos of the NCI buying rock cocaine at the Property shows a line of  
20 approximately six people queued in the backyard of the house, in front of a doorway leading  
21 into the residence, exchanging pleasantries with each other as if they are in line at a store, as  
22 they wait for Hill to sell them rock cocaine. The video then shows Hill seated inside the  
23 residence at the Property, arranging small portions of rock cocaine on a cutting board, with a  
24 pistol sitting by his leg, within easy reach. An approximately six year-old boy walks freely  
25 amongst this scene. In another video showing the counterfeit currency purchase, the  
26 Defendant-property owner sits within sight and earshot of Hill as he sells the counterfeit bills to  
27 the NCI, and another man walks up and asks Hill for rock cocaine, all while Hill is openly  
28 scanning the street with binoculars, looking for police activity.

1           5.       Hill was arrested and jailed in March 2018 when the LAPD-ATF task force  
2 investigation wrapped up. He was eventually sentenced to prison on drug and gun charges  
3 that were filed against him. The narcotics activity at the Property, however, did not cease.

4           6.       Rather, other individuals took up the established and lucrative drug-selling  
5 routine at the Property in Hill's absence. LAPD recently documented this activity with two  
6 more controlled rock cocaine buys at the Property, on April 5 and 10, 2019, in which the seller  
7 was sitting inside the residence on the Property and handing the narcotics to the NCI through a  
8 partially open window.

9           7.       The Property has been and remains in conspicuously disheveled and chaotic  
10 physical condition. Up to a dozen transients live in multiple ramshackle, makeshift tents and  
11 shacks in the backyard of the Property. People also sleep in some of the half-dozen (or more)  
12 cars, in varying states of repair, which are parked in the Property's front yard, driveway and  
13 backyard. Many of these transients serve as a built-in customer base for the drug sellers  
14 operating out of the house on the Property. Beyond this captive customer base, drug buyers  
15 who are not residents of the Property walk on and off the unsecured Property freely, before  
16 and after buying their drugs, at all times.

17           8.       In addition to selling and using drugs, the Property's residents and others who  
18 frequent the Property generate a steady stream of police calls for service, as these individuals  
19 reportedly assault, shoot at, point knives at, threaten, rob and steal from each other, as well as  
20 unfortunate passersby, for instance, who inadvertently get drawn into the Property's  
21 noxiousness.

22           9.       For instance, in 2016, a 15 year-old girl told responding LAPD officers that she  
23 was walking past the Property when a female sitting on a beach chair in the Property's front  
24 exterior area began heckling the girl, calling her a "bitch" and telling the girl that she was on the  
25 suspect's street and that the street "belonged to" the suspect. The suspect then approached  
26 the victim from behind and punched the victim in the back and pushed her from behind. The  
27 victim also told officers that the Property was known as a location where "crack," or rock  
28 cocaine, was sold. Investigating officers were unable to locate the suspect at the Property.

1           10. In the shooting incident referenced in paragraph 3, above, also in 2016, an  
2 anonymous caller told LAPD that two males were arguing outside of the residence on the  
3 Property. One of those males, later identified as Hill, then went into the residence, returned  
4 with a small handgun, and fired several shots at the victim, who then ran away. Responding  
5 officers found a spent nine millimeter Luger bullet casing in the street in front of the Property.  
6 Neither Hill nor the victim were located at the scene.

7           11. More recently, in summer 2018, police responded to the Property when Property  
8 resident Craig Sansom – who identifies himself as the Defendant's son, and who was found  
9 with the pre-marked bills used by the informant in LAPD's most recent controlled drug buy at  
10 the Property on April 10 -- reportedly held his sister at knifepoint while screaming about the  
11 whereabouts of his mother's (the Defendant's) jewelry. Also, in October 2018, the Defendant  
12 called police to report that her granddaughter and daughter had stolen her purse.

13           12. The entire corrosive criminal dynamic emanating from the Property occurs in a  
14 neighborhood populated overwhelmingly by law-abiding people, including families with  
15 children. Also worrisome is that Flournoy Elementary School is a short half-block east of the  
16 Property and parents walking their children to and from school are exposed to the Property's  
17 disorder and volatility on a daily basis.

18           13. With "crack" cocaine perpetually for sale on the Property; with users sauntering  
19 on to the Property at will and lining up to buy drugs; with the Property's backyard becoming a  
20 *de facto* shanty town; and with much of this phenomena occurring right in front of the  
21 Defendant, the Defendant is evidently unable or unwilling to manage the Property with even  
22 the slightest indicia of normal, lawful private property ownership. This sorry state of affairs is  
23 much to the detriment of the surrounding community, and law enforcement authorities that  
24 have had to devote scarce public resources to address the Property's noxious effects. The  
25 instant nuisance abatement prosecution is intended to bring this unacceptable, volatile and  
26 dangerous situation to a swift and permanent halt.

## II. THE PARTIES AND THE PROPERTY

### A. Plaintiff

14. Plaintiff, the People, is the sovereign power of the State of California designated in Health and Safety Code section 11571 and Code of Civil Procedure section 731 to be the complaining party in public law enforcement actions brought to abate, enjoin and penalize public nuisances.

### B. The Defendant

15. Defendant Mary Ruth Sansom ("Defendant") owns the Property, has owned it since approximately 1999, and resides there. She is 81 years of age and apparently uses a wheelchair.

16. Notwithstanding Defendant's recent report of being a theft victim at the Property, her far more significant and predominant impact on the situation at the Property stems from the fact that she has been aware of the narcotics dealing at the Property for years, as well as the large encampment of transient drug users on her Property, and directly or indirectly permits such activity there without taking steps to prevent it. When police have come on to the Property to take enforcement action against the blatant criminality and disorder at the Property, Defendant greets them with hostility and profanity-laced invective. Defendant is the person legally responsible for the severe and corrosive nuisance at the Property, whom Plaintiff is authorized to hold accountable through this Action.

17. The true names and capacities of defendants sued herein as Does 1 through 50, inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious names. When the true names and capacities of said defendants have been ascertained, Plaintiff will ask leave of the court to amend this complaint and to insert in lieu of such fictitious names the true names and capacities of said fictitiously named defendants.

### C. The Property

18. The Property's common address is 1675 East 112th Street, Los Angeles, CA

1 90059.<sup>1</sup> It is an approximately 1000 square foot, three-bedroom, two-bath, single-family  
2 residence located on a residential block with approximately 30 one- and two-story single-family  
3 homes. The Property is located six houses away – approximately 250 feet -- from the Lovelia  
4 P. Flournoy Elementary school site, where 550 K-5 students attend during the school year.

5 19. The Property's physical condition is strikingly rundown, as described above in  
6 paragraph 7. Amongst the aforementioned tents and cars is scattered all manner of junk and  
7 refuse. Inside the house, conditions are very cluttered, with hundreds of personal property  
8 items and household objects piled and scattered in the various rooms, whose sanitarianess is  
9 questionable.

10 20. The Property has a reputation in the community as a location where illegal  
11 narcotics are used, stored and readily available for walk-up purchase by users at all or most  
12 times of the day. The street-level drug sales routine that the Property houses and supports is  
13 open, notorious, ongoing and continuous. Even *after* police conducted two search warrants at  
14 the house and arrested the primary seller during the 2016-2018 LAPD/ATF task force  
15 investigation touching on the Property, the Property's prominence as a drug source in its local  
16 crime ecosystem persisted and the narcotics sales dynamic at the Property re-constituted itself  
17 in short order.

### 18 III. THE NARCOTICS ABATEMENT LAW

19 21. Since its enactment in 1972, the principal purpose of the Narcotics Abatement  
20 Law ("NAL")(Health & Saf. Code, § 11570, et seq.) is the abatement of buildings and places  
21 "used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving  
22 away any controlled substance, precursor, or analog specified in this division . . . ." (Health &  
23 Saf. Code, § 11570).

24  
25  
26  
27  
28 <sup>1</sup> The Property's legal description is: "Lot 131 and 132 of The Hunter Tract, in the City of Los Angeles, State of  
California, as per map recorded in Book 8, Page 125, of Maps, in the office of the County Recorder of Los  
Angeles County," APN 6069017026.

1           22.     The NAL provides that every building or place used for the purpose of unlawfully  
2 selling, serving, storing, keeping, manufacturing, or giving away any controlled substance,  
3 precursor, or analog *inter alia*, "is a nuisance which **shall** be enjoined, abated, and  
4 prevented . . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570  
5 [emphasis added]; *People ex rel. Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v.*  
6 *Superior Court* (1993) 20 Cal.App.4th 866, 870-871.)

7           23.     Health and Safety Code section 11571 authorizes a city attorney to bring an  
8 action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part:  
9 "Whenever there is reason to believe that a nuisance as described in Section 11570 is kept,  
10 maintained, or exists in any county, the district attorney of the county, or the city attorney of  
11 any incorporated city or of any city and county, in the name of the people, may . . . maintain an  
12 action to abate and prevent the nuisance and perpetually to enjoin the person conducting or  
13 maintaining it, and the owner, lessee, or agent of the building or place in or upon which the  
14 nuisance exists from directly or indirectly maintaining or permitting the nuisance."

15           24.     Health and Safety Code section 11573(a) provides that: "If the existence of the  
16 nuisance is shown in the action to the satisfaction of the court or judge, either by verified  
17 complaint or affidavit, the court or judge **shall** allow a temporary restraining order or injunction  
18 to abate and prevent the continuance or recurrence of the nuisance." (Emphasis added.) In  
19 addition, Health and Safety Code section 11581 provides, as an additional remedy, for the  
20 removal and sale of all fixtures and movable property on the premises used in aiding or  
21 abetting the nuisance and for the closure of the building for up to one year.

#### 22                                   IV. THE PUBLIC NUISANCE LAW

23           25.     Civil Code section 3479 defines a public nuisance as "[a]nything which is  
24 injurious to health, including, but not limited to, the illegal sale of controlled substances, or is  
25 indecent or offensive to the senses, or an obstruction to the free use of property, so as to  
26 interfere with the comfortable enjoyment of life or property. . . ." (See *City of Bakersfield v.*  
27 *Miller* (1966) 64 Cal.2d 93, 99 ["The Legislature has defined in general terms the word  
28 'nuisance' in Civil Code section 3479. . . ."])



1           26. Civil Code section 3480 defines a public nuisance as "one which affects at the  
2 same time an entire community or neighborhood, or any considerable number of persons,  
3 although the extent of the annoyance or damage inflicted upon individuals may be unequal."  
4 In particular, drug dealing, loitering, consumption of alcohol and illegal drugs, and boisterous  
5 conduct which creates a hooligan-like "atmosphere" constitutes a public nuisance. (*People ex*  
6 *rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)

7           27. Under Civil Code section 3491, the "remedies against a public nuisance are: 1.  
8 Indictment or information; 2. A civil action; or, 3. Abatement." "An abatement of a nuisance is  
9 accomplished by a court of equity by means of an injunction proper and suitable to the facts of  
10 each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249.)

11           28. Code of Civil Procedure section 731 authorizes a city attorney to bring an action  
12 to enjoin or abate a public nuisance. It provides, in pertinent part, "A civil action may be  
13 brought in the name of the people of the State of California to abate a public nuisance . . . by  
14 the city attorney of any town or city in which the nuisance exists." (*Ibid.*)

15           **V. FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

16           **[Health and Safety Code Section 11570, *et seq.* --**

17           **Against Defendant and DOES 1 through 50]**

18           29. Plaintiff hereby incorporates by reference paragraphs 1 through 28 of this  
19 Complaint and makes them part of the First Cause of Action, as if fully set forth herein.

20           30. The Property has been used since at least 2016, and is *currently* being used, for  
21 the purposes of unlawfully selling, serving, storing, keeping, manufacturing or giving away  
22 controlled substances in violation of Health and Safety Code section 11570, *et seq.* Further,  
23 the Property's community reputation is as a narcotics sales location.

24           31. Defendant, and DOES 1 through 50 (hereinafter "Defendants," collectively), are  
25 responsible for conducting, maintaining, and/or directly or indirectly permitting the nuisance as  
26 alleged herein. Plaintiff has no plain, speedy and adequate remedy at law and unless  
27 Defendants are restrained and enjoined by order of this Court, they will continue to use,  
28 occupy and maintain, and/or to aid, abet or permit, directly or indirectly, the use, occupation



1 and maintenance of the Property, together with the fixtures and appurtenances located therein,  
2 for the nuisance complained of herein, to the great and irreparable damage of the public and in  
3 violation of California law.

4 **VI. SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

5 **[Civil Code section 3479, et seq.**

6 **Against Defendant and DOES 1 through 50]**

7 32. Plaintiff incorporates by reference Paragraphs 1 through 31 of this Complaint and  
8 makes them part of this Second Cause of Action as though fully set forth herein.

9 33. From an exact date unknown but at least since 2016, through the present time,  
10 Defendants, have alternately owned, operated, managed and used, and/or directly or indirectly  
11 permitted to be occupied and used, the Property in such a manner as to constitute a public  
12 nuisance in accordance with Civil Code sections 3479 and 3480. The public nuisance, as  
13 described herein, is injurious to health, indecent or offensive to the senses, and/or an  
14 obstruction to the free use of property, so as to substantially and unreasonably interfere with  
15 the comfortable enjoyment of life or property by those persons living in the surrounding  
16 community. The public nuisance consists of, but is not limited to, blatant narcotics activity at  
17 the Property; the regular, menacing, and intimidating, presence of disorderly, violent and/or  
18 criminally inclined individuals at and around the Property; and the illegal presence of firearms  
19 and the occurrence of gunfire on or around the Property.

20 34. Defendants, who own or control the Property, knew or should have known of the  
21 nuisance, but nevertheless failed to take reasonable steps to prevent or abate it. As a result of  
22 this failure and their mismanagement of the Property, they have caused or contributed to a  
23 serious threat to the safety and welfare of any law-abiding occupants or visitors at the Property  
24 and persons in the surrounding community.

25 35. Unless Defendants are restrained and enjoined by order of this Court, they will  
26 continue to use, occupy and maintain, and to aid, abet or permit, directly or indirectly, the use,  
27 occupation, and maintenance of the Property, together with the fixtures and appurtenances  
28 located therein, for the purpose complained of herein, to the great and irreparable damage of

1 Plaintiff and in violation of California law.

2 PRAYER

3 **WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND**  
4 **DECREE AS FOLLOWS:**

5 AS TO THE FIRST CAUSE OF ACTION:

6 1. That Defendants, and the Property, be declared in violation of Health and Safety  
7 Code section 11570, et seq.

8 2. That the Property, together with the fixtures and moveable property therein and  
9 thereon, be found to constitute a public nuisance and be permanently abated as such in  
10 accordance with Section 11581 of the California Health and Safety Code.

11 3. That the Court grant a preliminary injunction, permanent injunction and order of  
12 abatement in accordance with Section 11570, et. seq. of the California Health and Safety  
13 Code, enjoining and restraining Defendants and their agents, officers, employees and anyone  
14 acting on their behalf, from unlawfully selling, serving, storing, keeping, manufacturing, or  
15 giving away controlled substances on the Property, and/or directly or indirectly maintaining or  
16 permitting such nuisance activity.

17 4. That as part of a Judgment, an Order of Abatement be issued, and that the  
18 Property be closed for a period of one year, not to be used for any purpose, and be under the  
19 control and custody of this Court for said period of time; in the alternative, if the Court deems  
20 such closure to be unduly harmful to the community, that Defendants pay an amount of  
21 damages equal to the fair market rental value of the Property for one year to the City or County  
22 in whose jurisdiction the nuisance is located in accordance with Health and Safety Code  
23 section 11581 subdivision (c)(1).

24 5. That the court order physical and managerial improvements to the Property in  
25 accordance with Health and Safety Code section 11573.5, and such orders as are otherwise  
26 appropriate, to remedy the nuisance on the Property and enhance the abatement process,  
27 including but not limited to, the following: improved lighting; sufficiently secure gating and  
28 fencing; prohibition of persons living in tents or other non-permanent and/or unpermitted

1 structures on the Property; limitation on who may be present on the Property to Defendant and  
2 a restricted list of enumerated individuals who have no history of narcotics criminal activity;  
3 prohibition on the parking of motor vehicles in the Property's front yard or back yard; limiting  
4 the parking of motor vehicles in the driveway to two such vehicles; removal of trash, refuse and  
5 overgrown vegetation, if any.

6 6. That Defendants each be assessed a civil penalty in an amount not to exceed  
7 twenty-five thousand dollars (\$25,000.00).

8 7. That all fixtures and moveable property used in conducting, maintaining, aiding or  
9 abetting the nuisance at the Property be removed by the LAPD and sold in the manner  
10 provided for the sale of chattels under execution. Said fixtures and property shall be  
11 inventoried and a list prepared and filed with this court.

12 8. That there shall be excepted from said sale, such property to which title is  
13 established in some third party not a defendant, nor agent, officer, employee or servant of any  
14 defendant in this proceeding.

15 9. That the proceeds from said sale be deposited with this court for payment of the  
16 fees and costs of sale. Such costs may occur in removal of said property and in closing said  
17 Property and keeping it closed.

18 10. That if the proceeds of the sale do not fully discharge all such costs, fees and  
19 allowances, the Property shall also be sold under execution issued upon the order of the court  
20 or judge and the proceeds of such sale shall be applied in a like manner. That any excess  
21 monies remaining after payment of approved costs shall be delivered to the owner of said  
22 Property. Ownership shall be established to the satisfaction of this court.

23 11. That Defendants, and any agents, trustees, officers, employees and anyone  
24 acting on their behalf, and their heirs and assignees, be perpetually enjoined from transferring,  
25 conveying, or encumbering any portion of the Property, for consideration or otherwise, without  
26 first obtaining the Court's prior approval.

27 12. That Defendants be ordered to immediately notify any transferees, purchasers,  
28 commercial lessees, or other successors in interest to the subject Property of the existence

1 and application of any temporary restraining order, preliminary injunction, or permanent  
2 injunction to all prospective transferees, purchasers, commercial lessees, or other successors  
3 in interest, *before* entering into any agreement to sell, lease or transfer the Property, for  
4 consideration or otherwise, all or any portion of the Property that is the subject of this action.

5 13. That Defendants be ordered to immediately give a complete, legible copy of any  
6 temporary restraining order and preliminary and permanent injunctions to all prospective  
7 transferees, purchasers, lessees, or other successors in interest to the Property.

8 14. That Defendants be ordered to immediately request and procure signatures from  
9 all prospective transferees, purchasers, lessees, or other successors in interest to the subject  
10 Property, which acknowledges his/her respective receipt of a complete, legible copy of any  
11 temporary restraining order, preliminary and permanent injunction, and deliver a copy of such  
12 acknowledgment to the Los Angeles City Attorney's Office, c/o Deputy City Attorney Steven  
13 Gold or his designee.

14 15. That Plaintiff recover the costs of this action, including law enforcement  
15 investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed  
16 \$500,000.00, from Defendants.

17 AS TO THE SECOND CAUSE OF ACTION

18 1. That the Property, together with the fixtures and moveable property therein and  
19 thereon, be declared a public nuisance and be permanently abated as such in accordance with  
20 Civil Code section 3491.

21 2. That Defendants, and their agents, officers, employees, and anyone acting on  
22 their behalf, and their heirs and assignees, be preliminarily and perpetually enjoined from  
23 operating, conducting, using, occupying, or in any way permitting the use of the Property as a  
24 public nuisance. Such orders should include, but not be limited to, physical and managerial  
25 improvements to the Property and such other orders as are appropriate to remedy the  
26 nuisance on the Property and enhance the abatement process.

27 3. Such costs as may occur in abating said nuisance at the Property and such other  
28 costs as the Court shall deem just and proper.

1           4.       That Plaintiff be granted such other and further relief as the Court deems just and  
2 proper, including closure and/or demolition of the Property.

3           AS TO ALL CAUSES OF ACTION

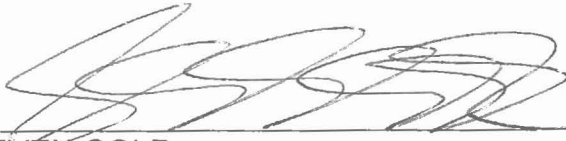
4           1.       That Plaintiff recover the amount of the filing fees and the amount of the fee for  
5 the service of process or notices which would have been paid but for Government Code  
6 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the  
7 amount of the fees for certifying and preparing transcripts.

8           2.       That Plaintiff be granted such other and further relief as the Court deems just and  
9 proper, including the appointment of a receiver to carry the Court's judgment into effect.

10  
11 DATED:   May 20, 2019

Respectfully submitted,

12           MICHAEL N. FEUER, City Attorney  
13           JONATHAN CRISTALL, Assistant City Attorney

14  
15 By:   
16 STEVEN GOLD  
17 Deputy City Attorney  
18 Attorneys for Plaintiff, THE PEOPLE OF THE STATE  
19 OF CALIFORNIA  
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